From: Bill Jacobs

To: <u>Dan Peacock; Jennifer Gaines; Gene Benbow; John Hebert</u>

Subject: Fw: color of rodent bait stations and CR testing

Date: 11/20/2011 08:54 PM

FYI

---- Forwarded by Bill Jacobs/DC/USEPA/US on 11/20/2011 08:51 PM -----

RE: color of rodent bait stations and CR testing

11/20/2011

08:51 PM

Bill to: Richard Ward Jacobs

Having now received responses from others, I can say that my earlier response stands, in essence.

A change only in the color of the unit would not require it to be retested unless there was reason to believe that the new dye weakened the station or compromised its protective qualities in some way. It would be up to the persons producing or evaluating the units to make that determination and to inform EPA of it. If we were persuaded that the change did not adversely affect the integrity or protective qualities of the station, there would not have to be additional testing.

▼ RE: color of rodent bait stations and CR testing

RE: color of rodent bait stations and CR testing

Richard to: Bill Jacobs

11/17/2011

Ward

11/17/2011

Yes, I only bring up the possibility as the station is non-refillable single plastic (no window). Any refillable station would likely have flexible locks and parts that I would be concerned regarding plastic pigment changes.

I will await further input. Thanks.

Rich Ward, Perritt Labs.

----Original Message----

From: Jacobs.Bill@epamail.epa.gov [mailto:Jacobs.Bill@epamail.epa.gov]

Sent: Thursday, November 17, 2011 3:05 PM

To: Richard Ward

Subject: Re: color of rodent bait stations and CR testing

One reason that might possibly apply would be if the coloring $\ensuremath{\mathsf{agent}}$

interacted with the plastic so as to weaken it or otherwise adversely

affect its condition otherwise. If a different plastic were used for

the new color or for a new portion of the station (e.g., a transparent $% \left(1\right) =\left(1\right) +\left(1\right) +\left($

"window" over the bait compartment), the new unit should be tested, at

least with kids (and dogs, if applicable). If those can be ruled out,

I would think, for example, that data on a black station would be acceptable for a gray one of the same design and composition.

Consider this a tentative answer. I'll forward this note to others in $% \left\{ 1,2,\ldots ,n\right\}$

EPA for comment.

From: "Richard Ward" <rward@perrittlab.com>

To: Bill Jacobs/DC/USEPA/US@EPA

Date: 11/17/2011 02:16 PM

Subject: color of rodent bait stations and CR testing

Greetings,

Hope you are well.

For the mouse bait stations, I have been asked to check if there would $% \left(1\right) =\left(1\right) +\left(1\right) +\left($

be any need for further child or adult protocol testing based on a plastic color change to a non-refillable station.

If you would like to discuss, let me know the best likely time to call. Thanks.

Please do not hesitate to contact me with any further questions or comment.

Richard A. Ward

your cGMP testing laboratory

ISO 17025

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